

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

SHAILA BERNARD,

Plaintiff,

v.

RTX CORPORATION, f/k/a RAYTHEON
TECHNOLOGIES CORPORATION

Defendant.

§
§
§
§
§
§
§
§
§
§

Case No. 3:24-cv-2944-X

PLAINTIFF'S TRIAL EXPERT WITNESSES DESIGNATION

Plaintiff expects to call the persons listed below to present evidence under Rule 702, 703, or 705 of the federal Rules of Evidence.

Michael Kellam, M.D.
4708 Alliance Blvd. Suite 550
Plano, TX 75093
469-800-6780

The subject matter on which Dr. Kellam is expected to testify is: Plaintiff's physical impairments.

Dr. Kellam is expected to testify: (1) that Plaintiff has had cerebral palsy and epilepsy since birth; (2) that Plaintiff's seizures due to epilepsy have been controlled with medication since 2001, but if untreated the epilepsy is substantially limiting with respect to the operation of major bodily function, especially neurological and brain function; and (3) that due to cerebral palsy, Plaintiff has left-side hemiparesis and she is substantially limited in performing manual tasks, walking, standing, lifting, bending, and working.

Samiska Shah, M.D.
8080 Independence Parkway, Suite 200
Plano, Texas 75025
972-596-9511

The subject matters on which Dr. Shah is expected to testify is: Plaintiff's physical impairments, and her ability to perform the essential functions of Plaintiff's job at Raytheon.

Dr. Shah is expected to testify: (1) that Plaintiff has had cerebral palsy and epilepsy since birth; (2) that Plaintiff's seizures due to epilepsy have been controlled with medication since 2001, but if untreated the epilepsy is substantially limiting with respect to the operation of major bodily function, especially neurological and brain function; (3) that due to cerebral palsy, Plaintiff has left-side hemiparesis and she is substantially limited in performing manual tasks, walking, standing, lifting, bending, and working; and (4) that Plaintiff was able to perform the essential functions of her software position, but Dr. Shah had insufficient information to opine on her ability to perform the essential functions of the hardware position Plaintiff was moved to.

Donald E. Uloth
Law Office of Donald E. Uloth
18208 Preston Rd. Suite D-9 # 261
Dallas, Texas 75252
Phone: (214) 989-4396

Because attorney fees are decided after trial, if necessary, Plaintiff does not expect to call a witness to testify at trial concerning attorney fees. If Plaintiff prevails on the merits of this case, Mr. Uloth, and possibly others, will present expert testimony concerning the work performed by Plaintiff's attorneys, the time spent, and the reasonable value of all reasonable and necessary legal services that were performed.

Respectfully submitted,

/s/ Donald E. Uloth
Donald E. Uloth
Texas Bar No. 20374200
Law Office of Donald E. Uloth
18208 Preston Rd. Suite D-9 # 261
Dallas, Texas 75252
Phone: (214) 989-4396
Email: don.uloth@uloth.pro
Counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify that on May 27, 2025 I am filing this motion electronically using the Court's ECF filing system, which will email a file-marked copy of this motion to all counsel of record.

/s/ Donald E. Uloth
Donald E. Uloth